

November 30, 2001

Sent via e-mail, hand-delivery, and/or U.S. Mail

Mary L. Cottrell, Secretary  
Massachusetts Department of Telecommunications and Energy  
One South Station, 2nd Floor  
Boston, MA 02110

Re: Verizon's Alternative Regulation Plan, D.T.E. 01-31

Dear Ms. Cottrell:

Enclosed for filing please find the Attorney General's Response to the Department's First Set of Information Requests to the Attorney General, DTE-AG 1-1, together with a Certificate of Service in the above-referenced proceeding.

Sincerely,

Karlen J. Reed  
Assistant Attorney General  
Utilities Division  
200 Portland Street, 4th Floor  
Boston, MA 02114  
(617) 727-2200

KJR/kr

Enc.

cc: Paula Foley, Hearing Officer (w/2 enc.)  
D.T.E. 01-31 Service List (w/enc.)

**THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**D.T.E. 01-31**

**Respondent: Lee L. Selwyn**

**Request:** Massachusetts Department of Telecommunications and Energy, Set #1

**Request Date:** November 20, 2001

**Response Date:** November 30, 2001

**DTE-AG 1-1:** Question Based upon Lee Selwyn's Direct Testimony. See p. 24, lines 1-3: Please provide all documents and sources relied upon in support of Dr. Selwyn's statement, "All else being equal, customers are less likely to accept a telephone number in an unfamiliar area code even for a somewhat lower monthly price."

**Response:** This statement is based on Dr. Selwyn's general knowledge and experience in the field of telecommunications regulation and, in particular, on his understanding of telephone numbering issues, having been involved in numerous area code relief and number resource optimization proceedings, including DTE 98-38 on behalf of the Attorney General.

The following documents are three examples of where this concept has been expressed by other telecommunications regulators:

- Iowa Utilities Board Docket No. SPU-99-22, Order Approving Geographic Split to Provide Numbering Plan Relief for the 515 Area Code, Issued February 24, 2000, at 13. (Attached in full)
- October 20, 1998 NANC Report, Section 12.1.7.2.3. (Section 12 attached; full document available at <http://www.fcc.gov/ccb/Nanc/>, select "Correspondence" and scroll down to the 10/23/98 item.)
- In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, Notice of Proposed Rulemaking, adopted May 27, 1999, Section VII, at para. 251. (Section VII attached; full document available at [http://gullfoss2.fcc.gov/cgi-bin/ws.exe/prod/ecfs/comsrch\\_v2.htm](http://gullfoss2.fcc.gov/cgi-bin/ws.exe/prod/ecfs/comsrch_v2.htm), type

“99-200” in the “Proceeding” box and select “NP” as the “Document Type.”)

**THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

---

Investigation by the Department of Telecommunications and Energy on )	
its own Motion into the Appropriate Regulatory Plan to succeed Price Cap )	
Regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts' )	D.T.E. 01-31
intrastate retail telecommunications services in the Commonwealth )	
of Massachusetts )	

---

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding by either hand delivery, mail, and/or e-mail.

Dated at Boston this 30th day of November 2001.

---

Karlen J. Reed  
Assistant Attorney General  
Utilities Division  
200 Portland Street, 4th Floor  
Boston, MA 02114  
(617) 727-2200